

COMMONWEALTH OF
PUERTO RICO
Environmental Quality Board

May 9, 2016

Mr. Ramón Torres, Chief
Response and Remediation Branch
Caribbean Environmental Protection Division
City View Plaza II - Suite 7000
Guaynabo, PR 00968-8069


Re: Technical Review of the Draft Corrective
Measures Implementation Building 517 (CCFTB-038
US Army Garrison-Fort Buchanan Army Reserves
Bayamón, Puerto Rico
EPA Id No. PR1210099999

Dear Mr. Torres:

The Hazardous Wastes Permit Division (HWPB) of the Land Pollution Control Area and the Federal Facilities Coordinator's Contractors has finished the review of the above-mentioned document.

Enclosed for your consideration, please find PREQB's comments and recommendations. If you have any questions or comments, please do not hesitate to contact Gloria M. Toro Agrait of my staff, at extension 3586 or 787-833-1188.

Cordially,


Nilda Del Mar Sánchez Santiago, Esq.
Manager
Land Pollution Control Area

cc: David Cuevas, Project Manager, EPA CEPD
Federal Facilities Coordinator, PREQB

Technical Review of the Draft Corrective
Measures Implementation Building 517 (CCFTB-038)
US Army Garrison-Fort Buchanan Army Reserves
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General Comment:

1. Please clarify the quantity of excavated soil that was disposed. In some instances it appears to be 40 yd³ and in other 60 yd³. Also clarification on how many from each excavation event should be provided. It is understood that 40 yd³ were excavated during July 2015 and an additional 20 yd³ were excavated during September 2015. However, the included manifest are for 40 yd³ disposed on December 2015. Also, the text indicated that in September additional soil was excavated from Excavations 3, 4 and 5 and goes on to state that 10 yd³ were excavated from Excavation 4 and 10 yd³ from Excavation 5, then no quantity is specified for Excavation 3.
- 1) The laboratory analytical reports for the September 2015 confirmatory sampling included on Appendix C were not certified by a chemist licensed in Puerto Rico as required by the Puerto Rico Environmental Quality Board's Regulation for the Control of the Hazardous Solid Wastes on its Rule 204: Monitoring, Recordkeeping Reporting, Sampling, and Test Methods (204.B) stated that "All tests and calculations shall be certified by an engineer licensed in Puerto Rico. All chemical analyses shall be certified by a chemical engineer or chemist licensed in Puerto Rico."

It is also a requirement from the "Colegio de Químicos de Puerto Rico" created by Commonwealth of Puerto Rico's Law 153 of May 1941 that create the professional board of chemists and Commonwealth of Puerto Rico's Law 97 from June 1983 which regulates the profession.

2. Please revise all the report in order to correct the concentrations' qualifier 'I', to eliminate the space between the number and the qualifier, Ex. 75.1I mg/kg and to write the 'I' wherever needed.

Page Specific Comments:

3. Page 3, Section 2.1.2: There appears to be a typographical error in almost all the bullets in this page. Please replace the word "respectfully" with "respectively".